

IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
BID PROTEST

FILED  
MAY 22 2017  
U.S. COURT OF  
FEDERAL CLAIMS

CONTINENTAL SERVICE GROUP, INC.

Plaintiff,

v.

UNITED STATES

Defendant.

No. 17-664 C

(Judge \_\_\_\_\_)

**MOTION FOR A PROTECTIVE ORDER**

Pursuant to Paragraph 17 of Appendix C, *Procedure in Protest Cases*, to the Rules of the United States Court of Federal Claims, Plaintiff Continental Service Group, Inc. (“ConServe”), through undersigned counsel, moves this Court for a protective order.

1. ConServe is an actual offeror for an Award Term Extension under its Task Order ED-FSA-02-O-0008, which was issued in response to Solicitation No. ED-08-R-0052, as amended (the “Solicitation”), issued by the U.S. Department of Education (“ED”). ConServe has filed a Complaint protesting ED’s decision not to make award to ConServe under the Solicitation.

2. The Complaint contains confidential and proprietary information and trade secrets of ConServe, the public release of which would cause competitive harm to ConServe.

3. The record in this matter will likely include various agency documents including source selection sensitive information, the public release of which could cause harm the integrity of the competitive process.

WHEREFORE, ConServe respectfully requests that the Court grant this motion, and

issue its standard protective order.

Dated: May 22, 2017.

*Of Counsel*

Todd J. Canni  
Alexander B. Ginsberg  
J. Matthew Carter  
PILLSBURY WINTHROP  
SHAW PITTMAN LLP  
725 South Figueroa Street, Suite 2800  
Los Angeles, CA 90017-5406  
Tel.: (213) 488-7213  
[Fax: \(213\) 629-1033](tel:(213)629-1033)  
Email: [todd.canni@pillsburylaw.com](mailto:todd.canni@pillsburylaw.com)  
[alexander.ginsberg@pillsburylaw.com](mailto:alexander.ginsberg@pillsburylaw.com)  
[matt.carter@pillsburylaw.com](mailto:matt.carter@pillsburylaw.com)

Respectfully submitted,

s/ Edward H. Meyers  
Edward H. Meyers  
STEIN MITCHELL CIPOLLONE  
BEATO & MISSNER LLP  
1100 Connecticut Avenue, N.W.  
Suite 1100  
Washington, DC 20036  
Tel.: (202) 661-0945  
Fax.: (202) 296-8312  
Email: [emeyers@steinmitchell.com](mailto:emeyers@steinmitchell.com)

*Counsel of Record for Plaintiff  
Continental Service Group, Inc.*



**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was filed electronically via the CM/ECF system. A true and correct copy was also served by email to the following party, this 22nd day of May 2017:

U.S. Department of Justice  
Commercial Litigation Branch  
1100 L Street, NW, 8<sup>th</sup> Floor  
Washington, DC 20530  
Fax: (202) 305-2062  
E-mail: [nationalcourts.bidprotest@usdoj.gov](mailto:nationalcourts.bidprotest@usdoj.gov)

s/ Edward H. Meyers  
Edward H. Meyers  
*Counsel of Record*  
STEIN MITCHELL CIPOLLONE  
BEATO & MISSNER LLP  
1100 Connecticut Avenue, N.W.  
Suite 1100  
Washington, DC 20036  
Tel.: (202) 661-0945  
Fax.: (202) 296-8312  
Email: [emeyers@steinmitchell.com](mailto:emeyers@steinmitchell.com)

*Attorney for Continental Service  
Group, Inc.*